

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN WILSON,

Defendant

Cr. No. 19-10080-LTS

**DEFENDANT JOHN WILSON'S PARTIALLY ASSENTED-TO MOTION TO  
PARTIALLY SEAL SENTENCING MEMORANDUM AND RELATED EXHIBITS**

Defendant John Wilson respectfully moves this Court for leave to file under seal portions of his Sentencing Memorandum, due to be filed on August 14, 2023 (Mr. Wilson will file a redacted version on the public docket), and certain of the exhibits to be attached to it.

Specifically, Mr. Wilson seeks the following:

1. To partially seal one letter of reference related to his sentencing, which is an exhibit to his Sentencing Memorandum. The portion of the letter Mr. Wilson seeks to seal discusses sensitive and confidential matters relating to one of his children. The Court previously granted a similar assented-to motion, regarding the same letter, that Mr. Wilson filed in connection with his first sentencing. ECF Nos. 2520, 2521.
2. To seal the discussion in the Sentencing Memorandum of his current financial circumstances (providing the Court an update since the time of the financial information the Presentence Investigation Report provided in February 2022), and associated exhibits providing back-up for that discussion.
3. To seal exhibits that will include sensitive, confidential, and personally identifiable information about USC students, and the discussion of those exhibits in the Sentencing Memorandum. These exhibits and this information have consistently

been treated as confidential by the Court throughout these proceedings and are subject to multiple existing Protective Orders. ECF Nos. 377, 809.

4. To seal additional exhibits, and the discussion of those exhibits in the Sentencing Memorandum, that are subject to the Court's Protective Order. ECF No. 377. This includes documents designated by third parties as "Confidential" pursuant to the Protective Order and documents that the Court has already ordered be under seal. Again, the Court has consistently treated these materials as confidential throughout these proceedings and ordered that they be filed only under seal.

Accordingly, under Local Rule 7.2, Mr. Wilson asks that the Court grant leave to file the Sentencing Memorandum and particular exhibits to it under seal. Mr. Wilson will publicly file a redacted version of the Sentencing Memorandum, a redacted version of the above-referenced letter, all exhibits that do not fit within one of the above categories, and notices of the exhibits that are filed under seal. Wilson will provide the government and Court unredacted copies of all materials and will provide the Court and the Probation Department courtesy copies of all materials.

Counsel for Mr. Wilson have conferred with counsel for the government on this Motion. The government has indicated it assents with regard to #1 above. Mr. Wilson's counsel understand the government takes no position with regard to categories #2 and 3 above and the government objects to category #4 above. Counsel for the government have declined to assent to category #4 without a complete list of all documents that fall into this category and have asserted that there are many documents produced by USC and other third parties that do not need to be sealed. Mr. Wilson agrees that there are many such documents that do not need to be sealed, and Mr. Wilson in fact has no personal stake in whether documents from third parties are publicly

filed; however, Mr. Wilson is bound by prior orders of the Court and thus intends—absent further guidance from the Court—to abide by those orders by filing under seal those materials that the Court’s prior orders require to be filed under seal.

Respectfully submitted,

*Counsel for John Wilson*

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Date: August 11, 2023

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1**

The undersigned counsel hereby certifies that counsel for the Defendant has conferred with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government has indicated it assents to category #1 above and takes no position on categories #2 and 3 above. The government stated it objects to category #4 above absent a complete list of documents that will fall into that category.

/s/ Michael Kendall  
Michael Kendall

**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall  
Michael Kendall